REMARKS

Claim 3 was previously canceled. Claims 1, 2, and 4-15 have been canceled. Claims 16-32 have been added. Applicant reserves the right to pursue the original claims and other claims in this and other applications. Claims 16-32 are pending in this application. The new claims should be allowable over the cited prior art including Bollman and Bottou.

The present invention relates to an apparatus that recognizes the drawing object type (character code, graphic code or raster graphic data) and it attributes (type, size, color, thickness and the like) from an input image signal of RGB (lines 19-22 of page 13). The background color information corresponding to the drawing object type is extracted from the input image signal, and then, the color conversion process is conducted based on the drawing object type, the drawing object attributes, and the background color information. Therefore, it is possible to overcome the difficulties of recognizing characters and lines on the background color. The claimed invention should not be limited, however, to the preferred embodiments described and shown in Applicant's specification and drawings.

Bollman discloses an apparatus that receives original image data, displays the original image data to a user, copies the original image data for update image data, and displays updated image data. The Bollman apparatus searches for at least character data, line data, and color data with respect to the update image data, and displays a suggestion.

Bollman further discloses that in the search of the character data, the line data, and the color data, an allowable color is determined by comparing the character data with the background data. If the color is not allowable, the apparatus displays a recommendation regarding the foreground color and the background color. If

Application No. 09/771,999 Reply to Office Action of March 3, 2006

character data having a color tone similar to the background is applied, the apparatus changes the color tone of the background so that the character data can be readable.

Even if Bollman suggests the drawing object attribute and the background color information; unlike the inventions recited in claims 16-32, Bollman does not disclose or suggest the <u>drawing object type</u>. Accordingly, Bollman cannot realize a compound document image in which characters and lines are clearly visible on the background color, which is an important aspect of the inventions of claims 16-32.

Similar to Bollman, Bottou discloses extracting the foreground color and the background color when image data are compressed. Nevertheless, Bottou fails to cure the deficiencies of Bollman because Bottou does not disclose or suggest that the drawing object type is considered. Accordingly, Bottou cannot realize a compound document image in which characters and lines are clearly visible on the background color, which is an important aspect of the inventions recited in claims 16-32.

Applicant respectfully submits that newly added claims 16-32 are patentable over the cited references because none of the references, whether considered alone or in combination, discloses or suggests the <u>drawing object type</u> in addition to the drawing object attribute and the background color information as recited by claims 16-32.

Accordingly, the cited references fail to disclose or suggest the inventions of claims 16-32.

Docket No.: R2184.0093/P093

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Dated: June <u>5</u>, 2006

Respectfully submitted,

Mark J. Thronson

Registration No.: 33,082

DICKSTEIN SHAPIRO MORIN &

OSHINSKY LLP

2101 L Street NW

Washington, DC 20037-1526

(202) 785-9700

Attorney for Applicant